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September 27, 2018

Via EFC

Hon. I. Leo Glasser
U.S. District Judge
United States District Court for the
Eastern District of New York
225 Cadman Plaza East
Room 921 South
Brooklyn, NY 11201

Hon. James Orenstein
U.S. Magistrate Judge
United States District Court for the
Eastern District of New York
225 Cadman Plaza East
Room 1227 South
Brooklyn, NY 11201

Re: *Young Advocates for Fair Education v. Cuomo, et al.*, No. 18-cv-4167

Your Honors:

I am writing on behalf of PEARLS, a non-profit organization that is committed to protecting the fundamental rights of parents who choose to educate their children in yeshivas and to enhancing the academic instruction those children receive at the yeshivas chosen by their parents.

Consistent with its mission, PEARLS would like to file an amicus curiae brief in support of Defendants and in opposition to Plaintiff's motion for a preliminary injunction. In accordance with the briefing schedule that has been set for that motion, on or before the October 5, 2018, deadline for Defendants to file their opposition to Plaintiff's motion for a preliminary injunction, PEARLS will (1) file a motion for leave to participate as an amicus curiae in opposition to the Plaintiff's motion for a preliminary injunction and (2) submit a proposed amicus brief in opposition to the motion.

This Court has the discretion to accept an amicus brief -- *See Doe #1 by Parent #1 v. New York City Dep't of Educ.*, No. 16-CV-1684, 2018 WL 3637962, at *9 (E.D.N.Y. filed July 31, 2018) (noting district courts have discretion to permit amicus briefs) -- and I have spoken with counsel for all parties and there is no objection to PEARLS filing an amicus brief. We have also advised all counsel that it is possible that other religious liberty groups will join the PEARLS amicus brief.

We therefore respectfully request the Court's permission to file a 25 page amicus brief in opposition to Plaintiff's motion for a preliminary injunction on or before October 5.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "A. Schick", written over a light blue horizontal line.

Avi Schick

cc: All counsel by ECF